

**UNITED STATES DISTRICT COURT
DISTRICT OF PUERTO RICO**

In re:

The Financial Oversight and Management Board
for Puerto Rico,

as representative of

The Commonwealth of Puerto Rico, et al.,

Debtors.¹

PROMESA

Title III

No. 17 BK 3283-LTS

(Jointly Administered)

**INFORMATIVE MOTION OF SYNCORA GUARANTEE, INC.
REGARDING ITS REQUEST TO BE HEARD AT THE
JUNE 8, 2023 OMNIBUS HEARING**

To the Honorable United States District Court Judge Laura Taylor Swain:

1. Syncora Guarantee, Inc. (“Syncora”) submits this informative motion in response to the Court’s *Order Regarding Procedures For Hearing On June 8, 2023, Omnibus Hearing* (the “Order”) (ECF No. 24336 in Case No. 17-3283)² and respectfully states as follows:

2. Daniel Salinas, Eric Kay, and Kate Scherling of Quinn Emanuel Urquhart & Sullivan, LLP, co-counsel for Syncora, will appear in person in the New York Courtroom.

¹ The Debtors in these Title III cases, along with each Debtor’s respective bankruptcy case number and the last four (4) digits of each Debtor’s federal tax identification number, as applicable, are the (i) Commonwealth of Puerto Rico (Bankruptcy Case No. 17-BK-3283-LTS) (Last Four Digits of Federal Tax ID: 3481); (ii) Puerto Rico Sales Tax Financing Corporation (“COFINA”) (Bankruptcy Case No. 17-BK-3284-LTS) (Last Four Digits of Federal Tax ID: 8474); (iii) Employees Retirement System of the Government of the Commonwealth of Puerto Rico (“ERS”) (Bankruptcy Case No. 17-BK-3566-LTS) (Last Four Digits of Federal Tax ID: 9686); (iv) Puerto Rico Highways and Transportation Authority (“HTA”) (Bankruptcy Case No. 17-BK-3567-LTS) (Last Four Digits of Federal Tax ID: 3808); (v) Puerto Rico Electric Power Authority (“PREPA”) (Bankruptcy Case No. 17-BK-4780-LTS) (Last Four Digits of Federal Tax ID: 3747); and (vi) Puerto Rico Public Buildings Authority (“PBA”) (Bankruptcy Case No. 19-BK-5233-LTS) (Title III case numbers are listed as Bankruptcy Case numbers due to software limitations).

² Capitalized terms not otherwise defined herein shall have the meanings ascribed to them in the Order.

3. Mr. Salinas intends to be heard on any matter raised by or presented to the Court at the Omnibus Hearing, and to respond to any statements made by any party related to the above-captioned Title III cases, or any adversary proceeding pending in the Title III cases, to the extent it impacts the rights, claims, or interests of Syncora.

4. The required Party Appearance Sheet accompanies this Informative Motion as Exhibit A.

DATED: May 30, 2023

Respectfully submitted,

REICHARD & ESCALERA

QUINN EMANUEL URQUHART &
SULLIVAN, LLP

By : /s/ Rafael Escalera
Rafael Escalera
USDC No. 122609
escalera@reichardescalera.com

Susheel Kirpalani (*pro hac vice*)
susheelkirpalani@quinnemanuel.com

Sylvia M. Arizmendi
USDC-PR 210714
arizmendis@reichardescalera.com

Daniel Salinas
USDC-PR 224006
danielsalinas@quinnemanuel.com

Carlos R. Rivera-Ortiz
USDC-PR 303409
riverac@reichardescalera.com

Eric Kay (*pro hac vice*)
erickay@quinnemanuel.com

255 Ponce de León Avenue
MCS Plaza, 10th Floor
San Juan, Puerto Rico 00917-1913

Kate Scherling (*pro hac vice*)
katescherling@quinnemanuel.com

Debra O’Gorman (*pro hac vice*)
debraogorman@quinnemanuel.com
51 Madison Avenue, 22nd Floor
New York, New York 10010-1603

Co-Counsel for Syncora Guarantee, Inc.

CERTIFICATE OF SERVICE

I hereby certify that on this same date, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to counsel for the parties of record.

/s/Carlos R. Rivera-Ortiz
USDC-PR 303409

EXHIBIT A

PARTY APPEARANCE SHEET

Name of Party	Syncora Guarantee, Inc.	
Attorney 1	Appearance Method	In Person/New York Courtroom
	Name	Daniel Salinas
	Email	danielsalinas@quinnemanuel.com
	Law Firm	Quinn Emanuel Urquhart & Sullivan, LLP
	Phone Number	202-538-8132
	Docket Entry No. of Notice of Appearance	Dkt. No. 22609 in Case No. 17-3283-LTS
	Zoom Screen Name	N/A
Attorney 2	Appearance Method	In Person/New York Courtroom
	Name	Eric Kay
	Email	erickay@quinnemanuel.com
	Law Firm	Quinn Emanuel Urquhart & Sullivan, LLP
	Phone Number	212-849-7273
	Docket Entry No. of Notice of Appearance	Dkt. No. 22609 in Case No. 17-3283-LTS
	Zoom Screen Name	N/A
Attorney 3	Appearance Method	In Person/New York Courtroom
	Name	Kate Scherling
	Email	katescherling@quinnemanuel.com
	Law Firm	Quinn Emanuel Urquhart & Sullivan, LLP
	Phone Number	212-849-7178
	Docket Entry No. of Notice of Appearance	Dkt No. 22609 in Case No. 17-3283-LTS
	Zoom Screen Name	N/A

